

Jon and Shelley Beyer
35100 Burt Rd
Saint Helens, Oregon 97051
(503) 750-6930
Shelley@resolveteam.com and jb@resolveteam.com

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF OREGON

Jon Charles Beyer
And Shelley Renee Beyer

Plaintiffs,

Vs.

BRIAN T. MOYNIHAN, and/or his
successor, individually, and in his official
capacity as **PRES/CEO OF BAC HOME**
LOANS SERVICNG, LP, *an ens legis*
being used to conceal fraud,

)
) Case no: 10-CV-00523-MO
) DECLARATION OF SHELLEY RENEE
) BEYER IN SUPPORT OF PLAINTIFF'S
) REPORT FOR DISCOVERY PLANNING
) MEETING PURSUANT TO RULE 26(F)(2)
) AND LOCAL RULE 26.1

VERIFIED

JAMES F. TAYLOR and/or his
successor, individually, and in his official
capacity as **PRES. OF FIN. & ADMIN.**
OF RECONTRUST COMPANY, N.A.,
an ens legis being used to conceal fraud,

BRIAN T. MOYNIHAN, and/or his
successor, individually, and in his official
capacity as **PRES/CEO OF BANK OF**
AMERICA, *an ens legis used to conceal*
fraud,

ANGELO MAZILO, and/or his successor,
individually, and in his official capacity as
PRES/CEO OF COUNTRYWIDE
HOME LOANS, INC., *an ens legis being*
used to conceal fraud,

R.K. ARNOLD and/or his successor,
individually, and in his official capacity as
PRES/CEO OF MORTGAGE
ELECTRONIC REGISTRATION
SYSTEMS, INC., *an ens legis being used*
to conceal fraud,

1 **JAMES STROTHER**, and/or his
2 *successor, individually, and in his official*
3 *capacity as* **EVP of WELLS FARGO &**
4 **CO.**, *an ens legis being used to conceal*
5 *fraud, et al,*

Defendant.

6 I, Shelley Renee Beyer, declare and state:

7 1. I make this declaration based on personal knowledge, and if called as a witness, I could
8 and would competently testify to the facts stated herein.

9 2. On Tuesday, September 7, 2010, via telephone, a meeting was concluded between Jon
10 Charles Beyer, Shelley Renee Beyer, and counsel for the Defendants, Steve McCarthy.

11 3. Mr. McCarthy informed Plaintiffs that it is customary that the two sides try to work
12 together to provide a joint statement to the court.

13 4. Mr. McCarthy drafted a joint statement and emailed it to Plaintiffs on Tuesday,
14 September 14, 2010.

15 5. After Plaintiffs reviewed the draft, Plaintiffs informed Mr. McCarthy that they would
16 like to write their own statement,

17 6. Mr. McCarthy accused Plaintiffs that they refused to cooperate to put together a joint
18 statement. This wasn't the case at all. Plaintiffs chose to write their own contract because
19 Plaintiffs didn't feel that somebody else writing a contract on their behalf, could benefit them in
20 anyway.

21 I declare under penalty of perjury that the foregoing is true and correct.

22 BY: Shelley-Renee: Beyer, agent

23 Shelley-Renee: Beyer, Plaintiff
24 Signed reserving all my rights at UCC 1-308

VERIFICATION

STATE OF OREGON

COUNTY OF Columbia

BEFORE ME personally appeared Shelley Renee Beyer, being by me first duly sworn and identified in accordance with Oregon law, deposes and says:

3. My name is Shelley Renee Beyer, plaintiff herein.

4. I have read and understood the attached and each fact alleged therein is true and correct of my own personal knowledge.

FURTHER THE AFFIANT SAYETH NAUGHT.

Shelley Renee Beyer

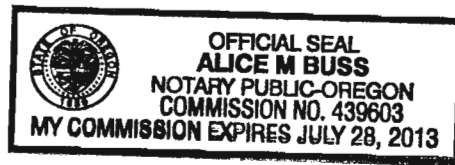
Shelley Renee Beyer, Affiant

SWORN TO and subscribed before me this 21 day of September 2010

Alice M Buss

Notary Public

My Commission Expires: July 28, 2013



CERTIFICATE OF SERVICE

UNDER PENALTY OF PERJURY, I CERTIFY that on this 21 day
of September, 2010, a copy of the foregoing DECLARATION SHELLEY RENEE
BEYER IN SUPPORT OF REPORT FOR DISCOVERY PLANNING MEETING
PURSUANT TO RULE 26(F)(2) AND LOCAL RULE 26.1 was provided by regular U.S.
mail to Stephen P. McCarthy, LANE POWELL, PC, 601 SW SECOND AVE, SUITE
2100, PORTLAND, OR 97204-3158.

Shelley-Renee Beyer

Shelley Renee Beyer
35100 Burt Road
Saint Helens, OR 97051
503-750-6930

STATE OF OREGON

COUNTY OF Columbia

BEFORE ME personally appeared Shelley Renee Beyer who, being by me first duly sworn and
identified in accordance with Oregon law, did execute the foregoing in my presence this 21 day
of September 2010.

Alice M. Buss
Notary Public

